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7 [Additional Counsel Listed On Signature Page]  
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10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12 **GGCC, LLC**, an Illinois Limited  
13 Liability Company, Individually and on  
Behalf of All Others Similarly Situated,

14 Plaintiffs,

15 v.

16 **DYNAMIC LEDGER SOLUTIONS,**  
17 **INC.**, a Delaware Corporation, **TEZOS**  
18 **STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, and **ARTHUR BREITMAN**,  
an Individual,

19 Defendants.  
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Case No: 3:17-cv-06779-RS

**JOINT DECLARATION OF GGCC,  
LLC GROUP IN SUPPORT OF  
MOTION FOR CONSOLIDATION,  
APPOINTMENT OF LEAD  
PLAINTIFF AND APPROVAL OF  
LEAD COUNSEL SELECTION**

Date: March 1, 2018

Time: 1:30 p.m.

Courtroom: 3 – 17<sup>th</sup> Floor

21 **ANDREW OKUSKO**, individually and  
22 on behalf of all others similarly situated,

23 Plaintiff,

24 v.

25 **DYNAMIC LEDGER SOLUTIONS,**  
26 **INC., THE TEZOS FOUNDATION,**  
**KATHLEEN BREITMAN, ARTHUR**  
**BREITMAN, and TIMOTHY**  
**DRAPER,**

27 Defendants.  
28

Case No: 3:17-cv-06829-RS

**ANDREW BAKER**, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, **ARTHUR BREITMAN**, an  
Individual, **JOHANN GEVERS**, an  
individual, **STRANGE BREW  
STRATEGIES, LLC**, a California  
limited liability company, and **DOES 1  
through 100 inclusive**,

Defendant.

Case No. 3:17-cv-06850-RS

**BRUCE MACDONALD**, Individually  
and on Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, **ARTHUR BREITMAN**, an  
Individual, **TIMOTHY COOK  
DRAPER**, an individual, **DRAPER  
ASSOCIATES**, **JOHANN GEVERS**,  
**DIEGO PONZ**, **GUIDO  
SCHMITZKRUMMACHER**,  
**BITCOIN SUISSE AG**, **NIKLAS  
NIKOLAJSEN**, and **DOES 1-100,  
INCLUSIVE**,

Defendants.

Case No. 3:17-cv-07095-JSC

1 We, Brian Beeman, as managing member and authorized representative of  
2 GGCC, LLC (“Beeman”), Ron Puma as managing member and authorized  
3 representative of Pumaro, LLC (“Puma”) and Nick Anthony (“Anthony”, collectively  
4 the “GGCC Group”) declare as follows:

5 1. We respectfully submit this Joint Declaration in support of the GGCC  
6 Group’s motion for appointment as Lead Plaintiff in the above-captioned action against  
7 Dynamic Ledger Solutions, Inc., Arthur Breitman, Kathleen Breitman, and Tezos  
8 Stiftung (collectively the “Defendants”). Each of us has personal knowledge about the  
9 information relating to us individually in this Joint Declaration.

10 2. As illustrated in our motion for appointment as Lead Plaintiff and  
11 supporting papers, we each suffered substantial losses from our investments in the  
12 Tezos ICO. We each understand and accept the responsibilities and obligations with  
13 which a lead plaintiff is charged under the PSLRA and are willing to oversee the  
14 vigorous prosecution of this litigation.

15 3. We are each highly incentivized to recover the cryptocurrencies invested  
16 into the Tezos ICO, and believe that litigation seeking the option of rescission is  
17 important to all U.S. based Tezos investors.

18 4. In order to ensure adequate representation of the class, we determined that  
19 it would be best to seek joint appointment as a lead plaintiff group. In making this  
20 determination, we considered, among other things, the factual basis of the claims  
21 pending against Defendants and the benefits of joint decision-making on behalf of the  
22 class.

23 5. In pursuit of this goal, we have communicated, separately and together, *via*  
24 conference call and email to discuss our duties as lead plaintiffs and the joint  
25 prosecution of this litigation. During these discussions, we addressed: the claims against  
26 the Defendants, the significance of a small and cohesive group representing the different  
27



1 types of investors in the Tezos ICO, ways in which we can cooperate to oversee this  
 2 litigation and our counsel, and reaffirmed our commitment to efficient and zealous  
 3 prosecution of class claims.

4 6. We intend to prosecute this litigation against the defendants in an  
 5 independent and vigorous manner. To this end, we have exchanged contact information  
 6 and discussed the importance of joint decision-making and regular communication that  
 7 will enable us to confer, with or without counsel, on short notice to ensure timely  
 8 decision making.

9 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of  
 10 the United States that the foregoing statements relating to me are true and correct to the  
 11 best of my knowledge. Executed this 24<sup>th</sup> day of January, 2018.

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 13  
 14 Brian Beeman 1/24/18

15 Brian Beeman, as managing member and  
 16 authorized representative of GGCC, LLC

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 20 Ron Puma, as managing member and  
 21 authorized representative of Pumaro, LLC

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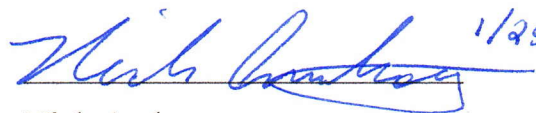
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23  1/25/2018  
24 Nick Anthony  
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